

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA :
- v. - : SUPERSEDING INFORMATION
MARQUIS DANIELS, : S3 13 Cr. 416 (RMB)
Defendant. :
:

COUNT ONE

The United States Attorney charges:

1. From in or about December 2012, up to and including on or about January 3, 2013, in the Southern District of New York and elsewhere, MARQUIS DANIELS, the defendant, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, DANIELS agreed with others to rob and did rob at gunpoint individuals working at commercial establishments in the Bronx, New York, and those establishments sold goods that had traveled in interstate commerce.

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COUNT THREE

The United States Attorney further charges:

4. On or about January 3, 2013, in the Southern District of New York and elsewhere, MARQUIS DANIELS, the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the robbery and attempted robbery charged in Count Two of this Information, knowingly did brandish, use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the brandishing, use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) & 2.)



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendant.

INFORMATION

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(Title 18, United States Code,
Sections 924(c), 1951 & 2)

PREET BHARARA
United States Attorney.
